

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
(Alexandria Division)

L.M., a minor, by his next friends and
parents, Jane Roe #1 and John Doe #1;

M.G., a minor, by his next friends and
parents, Jane Roe #2 and John Doe #2;

E.R., a minor, by his next friends and
parents, Jane Roe #3 and John Doe #3;

Plaintiffs,

v.

Jonathan Graham, Detective,
Leesburg Police Department,
in his individual and official
capacities;

John Doe #4,
Loudoun County Juvenile Detention Center,
in his individual and official
capacities;

John Doe #5,
Loudoun County Juvenile Detention Center,
in his individual and official
capacities;

John Doe #6,
Loudoun County Juvenile Detention Center,
in his individual and official
capacities;

Michelle F. Smith,
Superintendent, Loudoun County
Juvenile Detention Center,
in her official capacities;

CIVIL ACTION
No. 23-1574

Defendants.

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)

**UNOPPOSED MOTION TO SEAL
OPPOSITION TO GRAHAMS MOTION TO DISMISS
AND WAIVER OF ARGUMENT**

PLEASE TAKE NOTICE that plaintiffs request 1) to seal their opposition to Grahams motion to dismiss filed on February 21, 2024,¹ as we included two quotations (page 10 and page 14) of documents that defendant Graham has asked to be sealed; 2) we will file herewith a redacted version of the filed opposition, and 3) pursuant to Local civil Rule 7, of the United States District Court for Eastern District of Virginia, the parties waive argument.

CONCLUSION

WHEREFORE, for the reasons stated above and to be further articulated at a hearing on the motions, Plaintiffs respectfully ask this Court to deny Graham's Motion to Dismiss and to open discovery in the matter.

Respectfully submitted,
L.M., by his next friends and parents,
Jane Roe #1 and John Doe #1;

M.G., by his next friends and parents,
Jane Roe #2 and John Doe #2;

¹ Undersigned counsel called the clerk on February 21, 2024, and asked that the pleading be sealed pending this motion and a redacted filing. The pleading was sealed and so is not reflected on the docket.

E.R., by his next friends and parents,
Jane Roe #3 and John Doe #3;

By Counsel

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Certificate of Service

I hereby certify that on this 28th day of February, 2024, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will serve by email a copy to the following:

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